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MARGARET A. MCLETCHIE, Nevada Bar No. 10931
LEO S. WOLPERT, Nevada Bar No. 12658
MCLETCHIE LAW
602 South Tenth Street
Las Vegas, NV 89101
Telephone: (702) 728-5300
Fax: (702) 425-8220
Email: maggie@nvlitigation.com
Counsel for Plaintiff

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

Plaintiffs,	STIPULATION AND ORDER TO	
VS.	EXTEND:	
CITY OF RENO, Nevada, a Municipal	(1) PLAINTIFF'S TIME TO AME	
Corporation; JASON SOTO, in his official		

 $\mathbf{C}$ C capacity as the Chief of the Reno Police Department; DARIN BALAAM, in his official capacity as Washoe County Sheriff; DOES I - X,

REBECCA GASCA, an individual,

Defendants.

TO AMEND **PPOSE DEFENDANT RENO'S MOTION** TO DISMISS

Case. No.: 3:22-CV-00238-MMD-CSD

(FIRST REQUEST)

-AND-

(2) <u>DEFENDANT BALAAM'S TIME</u> TO ANSWER OR MOVE TO **DISMISS COMPLAINT** 

(SECOND REQUEST)

Pursuant to LR IA 6-1, Plaintiff REBECCA GASCA and Defendants CITY OF RENO, JASON SOTO, and DARIN BALAAM by and through their respective counsel, hereby stipulate and request that this Court extend the deadlines:

(1) For Plaintiff's deadline to file an amended complaint or response in opposition to Defendants City of Reno and Jason Soto's Motion to Dismiss (ECF No. 6) to be extended from the current deadline of June 30, 2022, by fourteen (14) days to July 14, 2022; and,

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(2) For Defendant Darin Balaam's deadline to answer or move to dismiss			
Plaintiff's Complaint (ECF No. 1), currently due on July 1, 2022 <sup>1</sup> , to be extended to July			
28, 2022, or fourteen (14) days after Plaintiff files an amended complaint or response in			
opposition to Defendant City of Reno's Motion to Dismiss (ECF No. 6), whichever is			
earlier.			
This Request for an extension of time is not sought for any improper purpose or			
other purpose of delay. This request for extension is based upon Plaintiff's counsel's			
schedule and the desire to promote judicial efficiency.			

WHEREFORE, the parties respectfully request that this Court or the deadlines

IT IS SO STIPULATED.

DATED this 29th day of June, 2022.

extended as stated above.

DATED this 29th day of June, 2022.

/s/ Leo S. Wolpert Margaret A. McLetchie, Bar No. 10931 Leo S. Wolpert, Bar No. 12658 602 South Tenth Street Las Vegas, NV 89101 (702) 728-5300 maggie@nvlitigation.com Counsel for Plaintiff Rebecca Gasca

/s/ William E. Cooper

William E. Cooper, Bar No. 2213 Deputy City Attorney Post Office Box 1900 Reno, NV 89505 (775) 334-2050 cooperw@reno.gov Counsel for Defendants City of Reno and Jason Soto

DATED this 29th day of June, 2022.

/s/ Michael W. Large

Michael W. Large, Bar No. 10119 Deputy District Attorney One South Sierra Street Reno, NV 89501 (775) 337-5700 mlarge@da.washoecounty.gov Counsel for Defendant Darin Balaam

<sup>&</sup>lt;sup>1</sup> This deadline was previously extended to July 1, 2022. (ECF No. 8.)

## <u>ORDER</u>

IT IS SO ORDERED.

U.S. DISTRICT JUDGE

DATED: July 5, 2022